

**FILED**  
UNITED STATES DISTRICT COURT  
LAS CRUCES, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO

JAN 26 2018

**MATTHEW J. DYKMAN**  
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Crim. No. 15-CR-4268

JOE LAWRENCE GALLEGOS  
EDWARD TROUP  
BILLY GARCIA  
ALLEN PATTERSON  
CHRISTOPHER CHAVEZ  
ANTHONY RAY BACA  
DANIEL SANCHEZ  
ARTURO ARNULFO GARCIA

Defendants.

STIPULATED PROTECTIVE ORDER

This matter is before the Court upon the filing of Motion to Obtain Mental Health Records (Doc 1190), Notice of Assertion of Privilege (Doc 1198), United States' Response to Defendant's Motion to Obtain Mental Health Records (Doc 1199) and Reply to Government's Response to Defendants' Motion to Obtain Mental Health Records (Doc 1215). The parties have stipulated to the entry of a protective order to facilitate the production of the Bureau of Prisons Forensic Evaluation of Eugene Martinez (Doc 596 Sealed) and Dr. Eric Westfried's Forensic Neuropsychological Competence to Stand Trial Evaluation (Doc 938 Sealed), and any other mental health records of Eugene Martinez that may subsequently be produced pursuant to Court order or agreement of the parties.

1. Not less than three days after entry of this order, the United States of America will disclose to counsel for Allen Patterson, Christopher Chavez, Anthony Ray Baca, Joe Gallegos, Daniel Sanchez, Edward Troup, Arturo Arnulfo Garcia, and Billy Garcia, Documents 596 (sealed) and 938 (sealed) with redactions by counsel for Eugene Martinez and the Government. Upon motion of a party, the Court will review the redactions *in camera*.

2. All materials in whatever form that the United States discloses under this

*Is the U.S. on board  
of this?*  
*[Signature]*  
1/25/18

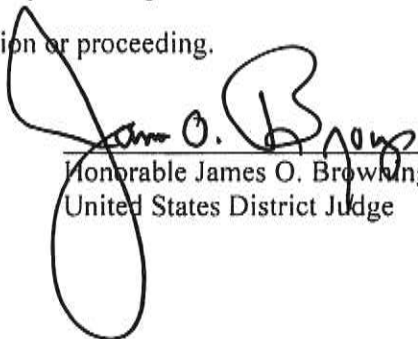
Protective Order will be disclosed to above defendants' counsel only, and may not be further disclosed, disseminated or discussed without the Court's leave, other than as follows:

- a. above defendants' counsel may disclose materials produced pursuant to this Order to members of the legal team, including, but not limited to, their retained defense investigator, law clerk(s), paralegals, legal assistants and expert witness(es), if any.
- b. Any information that the United States provides to above defendants' counsel pursuant to this Order may be discussed only with other defendants' counsel, their legal teams as defined above, Eugene Martinez' attorney, and the Assistant United States Attorneys who provided such information.
- c. A copy of this Order must be provided to any individual working for or with the defense before providing that individual with access to information produced pursuant to this Order. Counsel for the above defendants shall maintain a record of all persons to whom access to materials produced pursuant to this Order has been provided.
- d. At the conclusion of legal proceedings in the United States District Court, all members of the legal team who have received information pursuant to this Protective Order shall return such information to counsel for the respective defendants.


3. All information disclosed pursuant to this Order may be disclosed to and viewed by a defendant in the presence of and under the direct supervision of his counsel of record or staff, or another individual described in paragraph 2.a. of this Order. Absent further order of the Court, the defendants are not to be provided paper or electronic copies of any materials disclosed pursuant to this Order.

4. All material disclosed pursuant to this Order shall be used solely in connection with these proceedings, or any related appellate proceedings and collateral review, and not for any other purpose, including any other litigation or proceeding.

Randy Castellano  
is on Board with this.  
ADP  
1/25/18


  
Honorable James O. Browning  
United States District Judge


Submitted by:

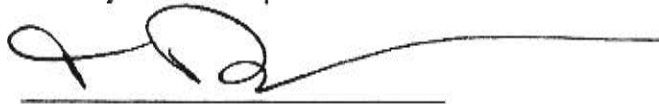
  
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Attorney for Eugene Martinez

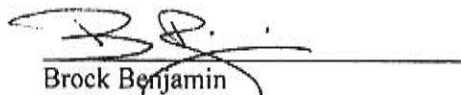
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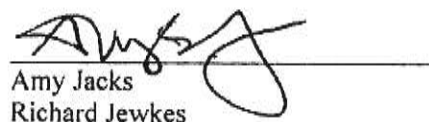
  
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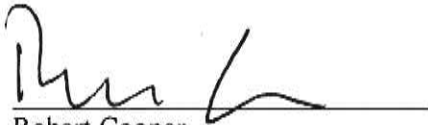
  
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